

Monte J. White & Associates, P.C.
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

IN RE:	§	CASE NO.09-70408-HDH
Delbert Lee Lewis	§	
and	§	CHAPTER 13
Shirley Don Lewis	§	
Debtor(s)	§	
	§	

MOTION TO WAIVE WAGE DIRECTIVE

NOW COMES, Delbert Lee Lewis and Shirley Don Lewis, in the above-styled and numbered cause, and file this Motion to Waive Wage Directive on behalf of Debtor(s), and in support thereof would respectfully show unto the Court as follows:

1. Debtor(s) filed a Chapter 13 Bankruptcy on 8/19/2009.
2. Debtor(s) are asking the Court to waive the requirement of payroll deduction for their Chapter 13 payment. Debtor works for a small egg farm operation in a small town, and feels that his position would be terminated if a wage directive was ordered.
3. Joint Debtor is retired and does not work, however, she receives a reliable, recurring deposit from her son and retirement funds that will cover their plan payment. Debtor(s) are in a 100% plan.

WHEREFORE, Debtor(s) Delbert Lee Lewis and Shirley Don Lewis, pray that the Motion to Waive Wage Directive filed on Behalf of Debtor(s) be granted and for such other and further relief to which said Debtor(s) may be entitled, either at law or in equity.

Respectfully submitted,

/s/Monte J. White, SBN 00785232
Attorney for debtor(s)

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on 8/26/2009 the office of the Chapter 13 Trustee was contacted and this office was advised that the Trustee

- does not oppose the motion
- opposes the motion

s/Monte J. White
Attorney for Debtor

CERTIFICATE OF SERVICE

I, Monte J. White, do hereby certify that I served a true and correct copy of the foregoing Motion to the parties listed on the mailing matrix by ECF and/or regular mail on 8/31/2009.

s/Monte J. White
Attorney for Debtor

Case 09-70408-hdh13

Dallas, TX 75242-1305

Quanah, TX 79252-6628

Northern District of Texas

Wichita Falls

Thu Aug 27 14:43:57 CDT 2009

Debt Recovery Associat

111 Smith Hines Rd Ste F

Greenville, SC 29607-5745

HSBC

ATTN: BANKRUPTCY

PO BOX 5213

Carol Stream, IL 60197-5213

Hardeman Co Appraisal District

PO Box 388

Quanah, TX 79252-0388

Herring Bank

1900 Pease St

Vernon, TX 76384-4608

IRS Special Procedures

1100 Commerce St., Room 951

Mail Stop 5029 DAL

Dallas, TX 75242-1001

Monte J. White & Associates

1106 Brook Ave

Wichita Falls TX 76301-5009

Palisad Coll

Attention: Bankruptcy Department

PO Box 100018

Kennesaw, GA 30156-9204

Rshk-cbsd

Attn.: Centralized Bankruptcy

PO Box 20507

Kansas City, MO 64195-0507

Wells Fargo

PO Box 60510

Los Angeles, CA 90060-0510

Delbert Lee Lewis

Box 118

Chillicothe, TX 79225-0118

Monte J. White

Monte J. White & Associates, P.C.

1106 Brook Avenue

Hamilton Place

Wichita Falls, TX 76301-5009

Shirley Don Lewis

Box 118

Chillicothe, TX 79225-0118

UST U.S. Trustee

1100 Commerce Street

Room 976

Dallas, TX 75242-1011

Walter 12,13 OCheskey

6308 Iola Avenue

Lubbock, TX 79424-2735

End of Label Matrix

Mailable recipients 16

Bypassed recipients 0

Total 16